

## **Instructions**

### **REPORT 3: Annual Inspection Summary Report**

This report is to be submitted to the Secretary by September 30<sup>th</sup> of each year pursuant to Title 27, CCR, section 15290(a)(2). Send to:

California Environmental Protection Agency  
Unified Program Section  
1001 'I' Street  
P.O. Box 2815  
Sacramento, California 95812

### **INSPECTION SUMMARY**

All program elements of every regulated business should be reflected in columns 1-5. This means that a regulated business would be counted in every row that is applicable to that business.

#### **Row A: Hazardous Materials Release Response Plans (HMRRP):**

These are businesses that are required to submit a HMRRP under Title 19 CCR, Section 2729.1.

Do not include businesses that are subject solely to local requirements.

#### **Row B: California Accidental Release Prevention (CalARP):**

Include all stationary sources that are subject to the CalARP program as defined in the CalARP regulations, Title 19 CCR section 2735.4(a), regardless of whether or not the CUPA has waived the risk management plan requirement for that business, pursuant to Title 19 CCR Section 2745.1(d).

#### **Row C: Underground Storage Tank (UST) Facilities:**

Include all facilities with one or more state/federally regulated Underground Storage Tank(s). Do not include tanks that are subject solely to local requirements.

#### **Row D: Aboveground Petroleum Storage Tank (AST) Facilities:**

There is no requirement to report the number of regulated facilities for ASTs, only report the AST facilities that were inspected. Include all AST facilities inspected, where Spill Prevention Control and Countermeasure (SPCC) plan verifications were conducted.

**Row E: Hazardous Waste Generators (All):**

Provide the number of all hazardous waste generators (State and Federal) within the jurisdiction.

**Row F: RCRA Large Quantity Generators (LQGs):**

Enter the total number of Federal RCRA LQGs within the jurisdiction. These are businesses that are hazardous waste generators pursuant to State and Federal definitions in CFR 40, CCR, Title 22 and HSC chapter 6.5.

(Row F is a subset of row E.)

**Row G: Recyclers:**

Provide the number of recyclers within the jurisdiction.

Count any business only once in this category.

**Row H: Onsite Hazardous Waste Treatment (PBR, CA, CE):**

These are businesses conducting hazardous waste treatment at the location where the waste is generated (onsite). Do not count Household Hazardous Waste operating under PBR. This on-site treatment is regulated under the permit by rule (PBR), conditional authorization (CA), and/or conditional exemption (CE) tier.

This is a per business count, not a per treatment unit count. For example: if a business has more than one treatment unit/tier, the business should be counted as **one** regulated business.

Do not count transportable treatment units (TTUs) or household hazardous waste (HHW) temporary events.

**Row I: Household Hazardous Waste (HHW):**

These are locations regulated under the HHW program as temporary events or permanent facilities. This type of entity is not counted as a generator.

Do not count HHW activities authorized by variances.

**Column 1: Number of Regulated Businesses:**

Every program element in a regulated business should be reflected in this column. Please refer to the specific instructions for each row when completing this column.

In column 1 on Report 3 the count of UP regulated businesses in each program element, A-I, may count the same businesses multiple times, once for each applicable program element.

*For example: Niceville County CUPA has 100 regulated businesses that are required to submit Hazardous Materials Release Response Plans (HMRRP). 75 of these are also Hazardous Waste Generators (HWG). Row A Column 1 would reflect 100 HMRRP and Row E Column 1 would reflect 75 HWG.*

**Column 2: Number of Regulated Businesses Inspected:**

For each business location each program element inspection should be counted once. Only one inspection per element may be counted per State fiscal year. Any type of inspection may be counted.

Multiple non-contiguous locations of a business are counted separately for purposes of counting inspections.

*For example: If an inspector from Niceville County CUPA inspected Big Industry Company, Inc.'s main office six times in one year for HMRRP, the CUPA should count this as one business inspection in Row A Column 2. If the inspector inspected Big Industry Company, Inc.'s at its six separate locations, the CUPA should count this as six inspections in Row A Column 2.*

**Column 3: Number of Routine Inspections:**

A routine inspection is a regularly scheduled inspection to evaluate compliance pursuant to one or more program elements. If a business was inspected more than once during the reporting period, and each inspection was regularly scheduled, each inspection should be counted in Column 3. Do not count complaint or follow-up inspection in this category.

Multiple non-contiguous locations of a business are counted separately for purposes of counting inspections.

*For example: During the State FY, an inspector from Niceville County CUPA inspected Big Industry Company, Inc. on four regularly scheduled Hazardous Waste Generator inspections, and the CUPA also conducted two follow-up inspections and one complaint inspection also for the hazardous waste generator program element. The CUPA would count each of the four inspections as four routine inspections for the hazardous waste generator program element, in column 3. The two follow-up inspections and one complaint inspection would be counted as three "No. of Other Inspections" for hazardous waste generator program element, in column 5.*

If a routine inspection is scheduled for a regulated entity and is found to be no longer in business an inspection should be counted in each of the appropriate program elements that applied to that business.

**Column 4: Number Of Routine Inspections that Returned to Compliance within Established Standards:**

This is a count of how many facilities came back into compliance within the established standard.

If there were violations found, that were not corrected within the established standards, these are not reported in column 4. Local standards may apply to this category for reporting purposes.

*For example: An inspector from Niceville County CUPA made a routine inspection on Big Industry Company, Inc.'s main office to inspect their HWG activities, recycling, and onsite hazardous waste treatment activities and 4 violations were found. The inspector leaves a notice to comply within 60 days for the recycling, UST's and onsite hazardous waste treatment activities. On the follow-up inspection, the inspector finds the company has returned to compliance within the above stated established standards for all 4 violations. Each program element that returned to compliance should be counted in Column 4.*

**Column 5: Number of Other Inspections:**

This is a count of other inspections such as complaint investigations, closure, release investigations, tank installation and/or removal oversight, tank cleaning, and follow-up inspections, or other inspections that may be in addition to regularly scheduled compliance inspections.

"No. of other inspections" does not include routine compliance inspections, field or site visits whose principle purpose is informational, educational, pollution prevention education, visits needed to verify administrative information, orient new owners or operators, or CalARP audits.

If a business was inspected more than once during the reporting period and none of these inspections were regularly scheduled, then each inspection should be counted in Column 5 by program element. Count all follow-up inspections conducted during this reporting period. Count any closure inspections conducted during this reporting period.

*Example #1: If an inspector from Niceville County CUPA inspected Big Industry Company, Inc., a RCRA LQG, on a follow-up inspection regarding their RCRA LQG program and their UST program, the CUPA would count one "No. of other inspection" in each respective program element,*

*including Hazardous Waste Generator (HWG), since RCRA LQG is a subset of the HWG program element.*

*Example #2: An inspector from Niceville County CUPA investigates a complaint about a business whose property is zoned for handling and/or generating hazardous materials and hazardous waste. The inspector inspects the business for compliance with all applicable program elements only to find that the business is operating without an EPA ID number or a valid permit. The inspector completes an inspection report, and issues a Notice of Violation/Notice to Comply, with a deadline for compliance to obtain an EPA ID number and a valid operating permit from the CUPA. This complaint inspection is counted under "No. of other inspections" in column 5 for each program element.*

If a facility is no longer in business upon follow-up to a complaint inspection, that follow-up would be counted in Column 5 for each respective program element with a violation.

## **INDICATORS OF INSPECTION CONSOLIDATION BY INSPECTION CATEGORY**

Numbers should be derived for combined routine, joint and/or integrated multi-media inspections from Columns 3 and/or 5. At least two program elements are reflected in rows K, L, or M.

### **Column 6: Number of Inspections**

Number of inspections in rows K through M performed for the reporting year.

#### **Row K: Combined Routine Inspections:**

One inspector conducting a routine inspection composed of more than one program element. Count the number of routine inspections from column 3 that were conducted as combined routine inspections. The reported number of combined routine inspections is not necessarily a total of column 3.

Program elements in rows E through I are a subset of the Hazardous Waste program. The total number of combined routine inspections are from rows E through I. Avoid adding together counts from program elements that may be within a subset of another program. If the only inspections reported are from rows E through I, it is not a combined inspection.

*For example: One inspector from Niceville County CUPA conducted a routine inspection on Big Industry Company, Inc.'s facility to inspect their Hazardous Waste Generator activities, HMRRP, USTs, and onsite*

*hazardous waste treatment activities. The CUPA would count this inspection as one in column 3 for each respective program element, and one in Row K Column 6 because one inspector combined two or more program elements into one inspection. However, two inspectors from Niceville County CUPA, one with expertise in the UST program element and one with expertise in onsite hazardous waste treatment activities, conduct a routine inspection on Big Industry Company, Inc.'s facility. The CUPA would count this inspection as one inspection in column 2 (Number of UP regulated businesses inspected) and as one inspection in column 3 (Number of Routine Inspections) for each respective program element. But, no counts should be reported as a combined routine inspection because the CUPA did not consolidate the inspection according to the combined routine inspection definition.*

**Row L: Joint Inspections:**

A joint inspection is an inspection of a regulated business conducted jointly by more than one agency within a CUPA's jurisdiction. Each inspector is from different program elements. Count the inspections, both 'Routine' from column 3 and 'Other' from column 5 that were conducted as a joint inspection.

The reported number of joint inspections is NOT necessarily a total of column 2, column 3, and column 5.

*For example: One inspector from Niceville County CUPA and one inspector from Niceville PA conducted an inspection together on Big Industry Company, Inc.'s facility. The inspectors inspect the company's USTs, recycling, and onsite hazardous waste treatment activities, and thus, count this inspection as one joint inspection.*

**Row M: Integrated or Multi-Media Inspections:**

An integrated inspection is an inspection of a regulated business conducted by the CUPA and other programs not within the scope of the Unified Program Agencies. This inspection is always a multi-agency inspection, even if only one inspector is on-site to conduct the inspection.

Multi-media inspections are conducted by one or more inspector for more than one medium, such as air, water, or soil. Count the inspections, both routine and other (Column 3, Column 5) conducted as integrated, and/or multi-media inspections. The reported number of integrated and/or multi-media inspections are NOT a total of column 2, column 3, and column 5.

*For example: If one inspector from Niceville County CUPA and one inspector from the local Air Pollution Control District made an inspection together to Big Industry Company, Inc.'s facility to inspect their USTs and*

*toxic hot spots, the CUPA would count this inspection as one "Integrated or Multi-Media" inspection.*

If there is one location where both Joint and Multi-Media inspections could be construed as being done, count that location as both a Joint and a Multi-Media inspection.

## **OTHER INFORMATION**

Numbers should be derived for RMP audits from Row B, Column 3.

### **Column 7: Number of CalARP Audits:**

The CUPA shall audit the businesses periodically for adequacy. Total the number of CalARP program risk management plan audits for the reporting period. Again, this is simply a count of the number of audits. Audits should not be counted as inspections.

### **Row N: CalARP Program--Risk Management Plan (RMP) Audits:**

In addition to the inspection of every stationary source every three years the CUPA shall audit RMPs. The audit shall include a review of the adequacy and of the RMP required revisions when necessary to ensure compliance with the CalARP program.